

# **EXHIBIT 1**

## LOEVY & LOEVY FIRM RESUME

Over the course of more than 20 years, Loevy & Loevy has been fighting on behalf of its clients in the vital and complex arenas of civil rights, consumer protection and data privacy, and whistleblower protection, among others. Our firm has won dozens of jury trials and secured hundreds of millions of dollars for our clients, including nearly \$200 million in class action settlements and verdicts alone. In 2012, the Honorable Matthew Kennelly, who has had the chance to observe the firm in two class actions (including one that went to jury trial), several wrongful conviction cases, and many others, noted that founding partner Jon Loevy and the firm “consistently produce written work that rivals that of any law firm in Chicago . . .” *Jimenez v. City of Chicago*, No. 09 C 8081, 2012 WL 5512266, at \*2. (N.D. Ill. Nov. 14, 2012).

Loevy & Loevy is made up of over forty attorneys and a talented support staff, including a Client Resource Coordinator who assists firm clients with accessing healthcare, educational and employment opportunities. Most of the firm’s attorneys graduated from top law schools and clerked for federal judges. Many firm attorneys have left or turned down jobs at the nation’s largest law firms to work at Loevy & Loevy. During the more than 20 years since the firm’s founding, the firm has built a reputation for its excellent work product and trial results, providing clients who might otherwise go unrepresented with the same quality legal work as the wealthiest corporations could buy from the nation’s largest firms.

The firm’s depth of trial experience, which is inculcated in its lawyers from day one, translates to more efficient and effective pretrial litigation strategies geared toward discovering the essential information needed for the return of a favorable verdict. It also allows the firm to extract more favorable settlements from defendants who recognize the firm’s willingness and ability to take matters to trial. Recent jury awards and settlements include: *Jacques Rivera v. Reynaldo Guevara, et al.*, No. 12 C 4428 (N.D. Ill. 2018) (\$17 million – wrongful conviction); *Young v. County of Cook*, No. 06 C 552 (N.D. Ill.) (over \$100 million in settlements after jury verdict – unconstitutional strip searching of inmates); *Cook County v. USI*, No. 2012 L 8066 (Cir. Ct. Cook Cty. Ill. 2018) (\$9,050,000 – breach of contract); and *Burgess v. Baltimore Police Department, et al.*, No. 1:15-cv-00834-RDB (D. Md. 2017) (\$15 million – wrongful conviction). The same drive to try cases recently produced an eve of trial settlement for the firm’s class in *Aranda v. Caribbean Cruise Line, et al.*, No. 12 C 4096 (N.D. Ill.), the largest settlement in any TCPA case in the nation.

### **CLASS ACTION PRACTICE**

The attorneys at Loevy & Loevy have successfully litigated numerous class actions in consumer and civil rights claims. Unlike many firms that practice in these areas, the firm's attorneys have not only settled class actions, they have actually tried class action cases to verdict before juries. For instance in *Young v. County of Cook*, No. 06-cv-552 (N.D. Ill.), Loevy & Loevy obtained a plaintiff's verdict in connection with civil rights claims on behalf of over 250,000 civil rights class members. The experience of trying a large class action to a jury has informed and improved the firm's pretrial handling litigation of the class actions it handles.

The judges overseeing the firm's class action cases have been satisfied that they made the right decision to appoint Loevy & Loevy. In *Flood v. Dominguez*, No. 08 C 153 (N.D. Ind. Dec. 14, 2012), the court noted that "class counsel [from Loevy & Loevy] ... are highly experienced, highly respected and have done an outstanding job in the face of a very strong opposition." In *Aranda v. Caribbean Cruise Line, Inc.*, No. 12 C 4096, 2017 WL 1369741, at \*9 (N.D. Ill. Apr. 10, 2017), the court recognized the Firm's expertise in conducting class action trials and stated "that counsel provided exceptional representation for the class and produced high-value output") (internal quotation omitted).

#### ***Representative Cases (Resolved at District Court Level)***

*Aranda v. Caribbean Cruise Line, et al.*, Case No. 12 C 4096 (N.D. Ill.): Co-class counsel in TCPA case, securing \$56-\$76 million settlement for the class. At the \$76 million level, it will be the largest TCPA settlement ever. In awarding attorneys' fees following the settlement, the court recognized "[Loevy &] Loevy's expertise in conducting class action trials," and noted "that counsel provided exceptional representation for the class and produced high-value output." *Aranda v. Caribbean Cruise Line, Inc.*, 12 C 4069, 2017 WL 1369741, at \*3 (N.D. Ill. Apr. 10, 2017).

*Young v. County of Cook*, Case No. 06 C 552 (N.D. Ill.): Class counsel in an action concerning the unconstitutional strip searching of inmates at the Cook County Jail, which resulted in settlements of more than \$100 million following the entry of partial summary judgment and trial on liability for the class members, as well as multiple successful damages trials, and follow-on litigation against the County's former insurers (*Cook County v. AIG, Inc.*, described in the below section). See *Young v. County of Cook*, 06 C 552, 2017 WL 4164238, at \*1, 3 (N.D. Ill. Sept. 20, 2017) (noting that cases resulted in \$107 million of settlements and that "the quality of counsel's performance [was] exceptional").

*Marconi v. City of Joliet*, Case No. 10-MR-0165 (Circuit of Will County, Ill.): Loevy & Loevy was class counsel for retired Joliet employees who alleged that Joliet violated collective bargaining agreements and the Illinois Constitution by increasing the price of City-provided retiree healthcare benefits. The case settled for \$702,139.99, plus valuable injunctive relief for the Class in the form of an agreement regarding the cost of benefits going forward.

*Dunn v. City of Chicago*, Case No. 04 C 6804 (N.D. Ill.): Class counsel in an action concerning the unconstitutional treatment of inmates held in lockup by the Chicago Police Department, which resulted in a \$16.5 million settlement.

*Flood v. Dominguez*, Case No. 08 C 153 (N.D. Ind.): Class counsel in an action concerning the unconstitutional treatment of inmates held in lockup at the Lake County Jail, which resulted in a \$7.2 million settlement.

*Solon v. Midwest Medical Records Association, et al.*, Case No. 04 CH 7119 (Cir. Ct. Cook Cty. Ill.): After securing adversarial class certification in this consumer class action and litigating the case all the way to the Illinois Supreme Court, Loevy & Loevy negotiated a settlement that allowed class members to recoup 70% of their damages.

***Representative Cases (pending)***

The firm currently is litigating numerous putative class actions, including the following:

*Vance v. International Business Machines Corporation*, No. 20 C 520 (N.D. Ill.): Interim Co-Lead Class Counsel in a putative class action involving alleged violations of the Illinois Biometric Information Privacy Act (“BIPA”) arising out of the use of facial recognition technology;

*Flores v. Motorola Solutions, Inc.*, No. 20 C 1128 (N.D. Ill.): Putative class action involving alleged BIPA violations arising out of the use of facial recognition technology;

*IBM Diversity in Faces Litigation*: A series of cases pending against Google, LLC; Amazon.com, Inc.; and Microsoft Corporation, among others, in the Northern District of California, Central District of California and Western District of Washington alleging BIPA violations in connection with facial recognition technology. See *Vance v. Google, LLC*, No. 5:20-cv-04696 (N.D. Cal.); *Vance v. Amazon.com, Inc.*, No. 2:20-cv-01084 (W.D. Wash.); *Vance v. Microsoft Corp.*, No. 2:20-cv-01082 (W.D. Wash.); *Vance v. FaceFirst, Inc.*, No. 2:20-cv-06244 (C.D. Cal.);

*Mark S. v. College Board*, No. 19 C 8068 (N.D. Ill.): Putative class action arising out of the alleged unlawful collection and distribution of student data);

*Dobbey v. Weilding*, No. 13 C 1068 (N.D. Ill.): Class counsel in an action concerning the constitutionality of the conditions of confinement at Stateville Correctional Center;

*Mays v. Dart*, No. 20 C 2134 (N.D. Ill.): Co-class counsel for class of detainees at the Cook County Jail in case for injunctive relief regarding the violation of class members' constitutional rights in light of the COVID-19 outbreak at the Cook County Jail. After obtaining conditional certification and a preliminary injunction, which is on appeal, the case is proceeding on the merits in the district court.

*Ross et al. v. Gossett*, Case No. 15 C 309 (S.D. Ill.): Co-class counsel for a class of approximately 10,000 individuals in IDOC custody who were subject to abusive and humiliating searches during facility-wide searches at four IDOC prisons in Southern Illinois;

*Antonio Solis, et al. v. Hilco Redevelopment LLC, et al.*, No. 20 C 2348 (N.D. Ill.): Putative class action arising out of the alleged botched demolition of former coal plant that subjected local community to a massive toxic plume in the midst of the COVID-19 pandemic.

#### **REPRESENTATIVE JURY AWARDS AND SETTLEMENTS** **(Non-Class Action)**

In addition to its class action practice described above, Loevy & Loevy (either as sole counsel or with co-counsel) has secured hundreds of millions of dollars in jury awards and settlements covering various substantive areas of the law, including the following:

*Jacques Rivera v. Reynaldo Guevara, et al.*, Case No. 12 C 4428 (N.D. Ill): In 2018, Loevy & Loevy obtained a \$17 million jury verdict for Jacques Rivera, who was wrongly convicted of a murder he did not commit and spent 21 years in prison as a result. Rivera was framed by Chicago Police officer Reynaldo Guevara, who is responsible for the wrongful convictions of more than 18 men. The jury also awarded \$175,000 in punitive damages against three police officers involved in the case.

*Anthony Kuri (a.k.a. Ramsey Qurash) v. City of Chicago et al.*, Case No. 1:13-cv-1653 (N.D. Ill.): In 2018, Loevy & Loevy obtained a \$4 million jury verdict for a man who was wrongfully arrested based on fabricated evidence and spent three years in Cook County Jail awaiting trial for murder. The jury also awarded punitive damages in the total amount of \$50,000 against two individual Defendant Officers.

*Cook County v. USI*, Case No. 2012-L-008066 (Cir. Ct. Cook Cty. Ill.): In March 2018, Loevy & Loevy tried this breach of contract case with co-counsel, resulting in a \$9,050,000 verdict.

*Burgess v. Baltimore Police Department, et al.*, Case No. 1:15-cv-00834-RDB (D. Md.): In 2017, Loevy & Loevy won a \$15 million verdict for a man who spent nearly twenty years in prison after being wrongfully convicted of a murder he did not commit.

*Doe v. County of Milwaukee*, Case No. 2:14-cv-00200 (E.D. Wisc.) (captioned as *Martin v. County of Milwaukee* at trial): In 2017, Loevy & Loevy won a \$6.7 million verdict on behalf of a woman who had been sexually assaulted by a correctional officer in the Milwaukee County Jail, including a jury finding that the officer had been acting within the scope of his employment and therefore that the County was required to pay the verdict entered against the officer.

*Fields v. City of Chicago*, Case No. 10-cv-1168 (N.D. Ill.): In 2016, Loevy & Loevy served as lead trial counsel in wrongful conviction case that resulted in a \$22 million verdict for the Plaintiff, including a verdict against the City of Chicago for unconstitutional practices.

*United States ex. rel. Cieszynski v. LifeWatch Services, Inc.*, Case No. 13-cv-4052 (N.D. Ill.): In 2016, Loevy & Loevy secured a settlement of \$12,975,000 in this declined False Claims Act case accusing LifeWatch Services, Inc. of defrauding government insurance programs.

*Sanders v. City of Chicago Heights*, Case No. 13-cv-0221 (N.D. Ill.): In 2016, Loevy & Loevy secured a \$15 million settlement for an individual who spent 20 years in prison after being wrongfully convicted of murder.

*Holmes v. Garrett*, Case No. 12-cv-2333 (E.D. Mo.): In 2016, we secured a \$2.5 million verdict for a client who was wrongfully convicted for drug possession and spent 5 years in prison as a result. We were brought in to serve as trial counsel after discovery was completed.

*Estate of Keith MacNeice Jr. v. City of Chicago*, Case No. 2009 L 2962 (Cook County Cir. Ct. Ill.): In 2015, we won a \$2.75 million jury verdict on behalf of a young man who was killed during an unauthorized and unlawful high-speed police chase.

*Rivera v. City of Waukegan*, Case No. 12-cv-08665 (N.D. Ill.): In 2015, Loevy & Loevy secured a \$20 million settlement for a client who spent 20 years in prison after being wrongfully convicted of rape and murder. This is believed to be the largest wrongful conviction settlement for an individual plaintiff.

*United States ex rel. Keiser v. McHugh*, Case No. 08-02443 (N.D. Ill.): Loevy & Loevy served as relator's counsel in this False Claims Act case, which resulted in a \$12 million settlement.

*Harden v. Kachiroubas*, Case No. 12 CV 8316 (N.D. Ill): In 2014, Loevy & Loevy participated in a \$40 million settlement with the Illinois State Police on behalf of the "Dixmoor Five," a group of five young men who were wrongfully convicted of the sexual assault and murder of a teenage girl. James Harden, Loevy & Loevy's client, was among the plaintiffs in the case. He and the rest of the Dixmoor Five also settled their claims against the Village of Dixmoor for an additional undisclosed sum. The Dixmoor Five case remains the largest settlement of a wrongful conviction case in the history of Illinois.

*Gillard v. City of Chicago*, Case No. 10 CV 7606 (N.D. Ill.): In 2014, Loevy & Loevy reached a \$6.375 million settlement with the City of Chicago for client Larry Gillard, who spent 12 years in prison for a rape he did not commit.

*Ayers v. City of Cleveland*, No. 12 C 753 (N.D. Ohio): In 2013, Loevy & Loevy secured a \$13,210,000 verdict on behalf of a wrongfully convicted client against two Cleveland police officers, which is believed to be the highest civil rights judgment ever entered against Cleveland police officers.

*Fox v. Barnes*, Case No. 09-cv-05453 (N.D. Ill.): In January 2013, we won a \$12 million verdict on behalf of a former Illinois Department of Corrections inmate who suffered brain damage after being denied proper medical care.

*Jimenez v. City of Chicago*, Case No. 09-cv-8081 (N.D. Ill.): In January 2012, we won a \$25 million jury verdict for a client who spent 16.5 years in prison after being wrongfully convicted. A report published in the National Law Journal lists this verdict as being one of the top 100 verdicts of 2012.

*Sandra T.E. v. Sperlik*, Case No. 05-cv-473 (N.D. Ill.): In July 2010, a jury awarded \$3.6 million to Loevy & Loevy's clients who had been sexually abused by a band teacher in Berwyn, Illinois.

*Johnson v. Guevara*, Case No. 05-cv-1042 (N.D. Ill.): In June 2009, we won a \$21 million jury verdict for our client in federal court in Chicago. The client had spent nearly 12 years wrongfully imprisoned for a murder he did not commit. The jury concluded that a Chicago Police Department detective violated the client's constitutional rights by causing his wrongful conviction.

*Borsellino v. Putnam*, Case No. 00-CH-13958 (Cir. Ct. Cook Cnty. Ill.): We won an \$11 million jury verdict on behalf of a client who alleged that his former business partners had defrauded him in connection with the sale of their business.

*White v. McKinley*, Case No. 05-cv-203 (W.D. Mo.): In August 2008, we won a \$16 million jury verdict for our client who had been wrongfully convicted and served more than five years in prison.

*Ware v. City of Chicago*, Case No. 04-cv-2612 (N.D. Ill.): In February 2007, we won a jury verdict for our client who was shot and killed by the Chicago Police following a car chase. Following the jury's verdict, the City agreed to pay \$5 million to resolve the case.

*Coffie v. City of Chicago*, Case No. 05-cv-6745 (N.D. Ill.): In October 2007, we won a \$4 million jury verdict for our client in federal court in Chicago. The client was in an automobile that was stopped by Chicago Police Officers, who then drove the client to an alley and during the course of a body search, jammed a screwdriver into the client's rectum.

*Finwall v. City of Chicago*, Case No. 04-cv-4663 (N.D. Ill.): In October 2007, we won a \$2 million jury verdict for our client in federal court in Chicago. The client was charged and prosecuted for the heinous crime of attempted child abduction, a crime of which he is completely innocent. The jury concluded that the Chicago Police Department detectives violated the client's rights by maliciously prosecuting him for a crime he did not commit.

*Dominguez v. Hendley*, Case No. 04-cv-2907 (N.D. Ill.): In October 2006, we won a \$9 million jury verdict for our client, a Mexican immigrant who spent four years in prison as a teenager after being wrongfully convicted.

*Waits v. City of Chicago*, Case No. 04-cv-4010 (N.D. Ill.): In 2002, Loevy & Loevy won a \$2.015 million jury verdict on behalf of a client who was beaten and retaliated against by police officers after he squirted a Chicago Police officer with a water bottle.

*Regalado v. City of Chicago*, Case No. 96-cv-1736 (N.D. Ill.): In 1999, Loevy & Loevy secured a \$28 million jury verdict against the City of Chicago in a police brutality case where our client was beaten into a coma by two Chicago Police Officers. That award is the largest police brutality jury verdict in the history of the City, and is believed to be the highest tort verdict against Chicago as well.

*Grayson v. The City of Aurora, et al.*, Case No. 13-cv-017705 (N.D. Ill.): In 2016, Loevy & Loevy secured a settlement in the amount of \$3 million for a man – a teenager at the time of his arrest – who was wrongfully convicted of murder and spent more than 11 years innocently incarcerated.

*Wanda Colon, As Administrator of the Estate of Cesar Munive, deceased, v. Town of Cicero and Donald Garrity*, Case No. 12-cv-5481 (N.D. Ill.): In 2017, Loevy & Loevy secured a settlement of \$3.5 million for the death of a man shot by a Cicero police officer. It was also successfully alleged that the Defendant Town of Cicero was negligent in hiring the officer who fatally shot our client's son, and that the officer should not have been on the force at the time of the shooting.

*Kerry Porter v. Louisville Jefferson County Metro Government et al.*, Case No. 3:12-cv-829-S (W.D. KY.): In 2018, Loevy & Loevy secured a settlement in the amount of \$7.5 million for a man wrongfully convicted of murder and who spent 14 years incarcerated until his release.